

## **Integrated Resource Planning (IRP, R.20-05-003)**

### **Instructions and Template for LSEs Substituting Delayed Excess D.19-11-016 Procurement Capacity for D.21-06-035 Mid-Term Reliability (MTR) Procurement**

Energy Division staff recognizes that some LSEs signed contracts for resources to meet their D.19-11-016 procurement obligations before June 30, 2020 that are now facing delays and will no longer come online in time to meet the D.19-11-016's milestone compliance dates. In some cases, LSEs have entered into new contracts with different resources to meet these obligations. This disconnect is jeopardizing the ability of those delayed resources to come online at all for two key reasons:

- 1) They are no longer needed by the LSE to meet their D.19-11-016 obligations; and
- 2) They are not eligible to count toward MTR because their contract execution date makes them a MTR baseline resource and they were included on the Baseline Generator List for D.21-06-035.

To address any potential disconnect between resource counting and development, LSEs can provide information to Energy Division staff about the changes they are requesting in how their D.19-11-016 resources are being counted for compliance. Resources eligible for this reconsideration are those that LSEs procured in excess of their D.19-11-016 obligations, and which meet all requirements for an LSE's D.21-06-035 obligations except that they are included in the Baseline Generator List of resources (thus currently excluding it from counting toward D.21-06-035 compliance).

Staff's guidance is that LSEs with such a resource can request to swap it with a replacement resource/s they contracted to meet their D.19-11-016 obligations, such that the delayed resource would now be in excess of its D.19-11-016 requirements. The delayed resource now in excess of D.19-11-016 obligations would be removed from the D.21-06-035 Baseline Generator List, and the new resource that the LSE is procuring to replace that capacity would be added in its place. To pursue this process, staff requests LSEs to fill out the LSE Swap Template below demonstrating that the D.19-11-016 excess capacity is incremental to their D.19-11-016 obligations and was procured to replace the delayed resource's capacity to meet their D.19-11-016 procurement obligations. Completed templates should be submitted to [IRPDataRequest@cpuc.ca.gov](mailto:IRPDataRequest@cpuc.ca.gov). For a sample of how to complete this template, please see the Sample Complete Template below. LSEs must have submitted sufficient supplemental documentation through regular compliance filings such that staff is able to verify the details provided on this form, as well as submitted a remediation plan that includes specific documentation of the cause of the delay. If supplemental documentation is missing, staff may not be able to grant the request. Upon submission of the LSE Swap Template, Staff may request additional documentation of the cause of the delay. Resources eligible for consideration must be both D.19-11-016 excess procurement, which are allowed to count toward D.21-06-035, and D.21-06-035 baseline resources that are excluded from counting towards the decision's requirements. Parties can contact Energy Division staff

at [IRPDataRequest@cpuc.ca.gov](mailto:IRPDataRequest@cpuc.ca.gov) if they have questions about whether resources are eligible for this swap.

# LSE Swap Template

**LSE Name:** \_\_\_\_\_

**Description of Swap:**

*LSE should provide a short description of the changes it is proposing, including a description of the nature of the request, especially if it is due to a resource's development being delayed.*

**Full list of resources fulfilling LSE's D.19-11-016 requirements**

Project Name	Project CAISO ID (if different)	Project CAISO Queue/WDAT #	D.19-11-016 NQC MW	Nameplate MW	Contract Status <sup>1</sup>	COD

**List of resources previously reported as fulfilling LSE's D.19-11-016 requirements that are now excess and intended for MTR (i.e., resources that should be removed from the Baseline Generator List for D.21-06-035)**

Project Name	Project CAISO ID (if different)	Project CAISO Queue/WDAT #	D.19-11-016 NQC	Nameplate MW	Contract Status	COD

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<sup>1</sup> LSEs should follow the instructions included in the Resource Data Template. For the most recent instructions, please check the [CPUC's Integrated Resource Plan and Long Term Procurement Plan](#) page.

# Sample Complete Template

**LSE Name:** LSE 1

## Description of Swap:

Sample\_2 and Sample\_3 were delayed due to COVID-19 supply chain disruptions and will no longer be online by August 1, 2022 as required by D.19-11-016. LSE 1 is planning on substituting Sample\_1 in its place, which is currently online. LSE 1 is currently in discussions with both resources' developers regularly, and these projects are currently facing no additional delays.

## Full list of resources fulfilling LSE's D.19-11-016 requirements

Project Name	Project CAISO ID (if different)	Project CAISO Queue/WDAT #	D.19-11-016 NQC MW	Nameplate MW	Contract Status	COD
Sample_1		1234	100 MW	150 MW	Online	4/6/2022

**List of resources previously reported as fulfilling LSE's D.19-11-016 requirements that are now excess and intended for MTR (i.e., resources that should be removed from the Baseline Generator List for D.21-06-035)**

Project Name	Project CAISO ID (if different)	Project CAISO Queue/WDAT #	D.19-11-016 NQC MW	Nameplate MW	Contract Status	COD
Sample_2		4321	50 MW	75 MW	Development	4/6/2024
Sample_3		5678	50 MW	75 MW	Development	4/6/2024